Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382

AIR QUALITY PERMIT

Permittee Name: **The Hennegan Company**
Mailing Address: **7455 Empire Dr., Florence, Kent**

is authorized to operate a printing business using offset lithograph

Source Name: **The Hennegan Compa**
Mailing Address: **7455 Empire Dr.**
Florence, Kentu; 4104
Source Location: **7455 Empire Dr., Florenc**

Permit Type: **Federally Enforceable Part 70**
Review Type: **Synthetic Mi Title V**

Permit Number: **V- 036**
Log Number: F366
Application
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ID #: 80-0088
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County: Boone

Issuance Dat
Expiration D e:

John E. Hornback, Director

DEP7001 (1-97)
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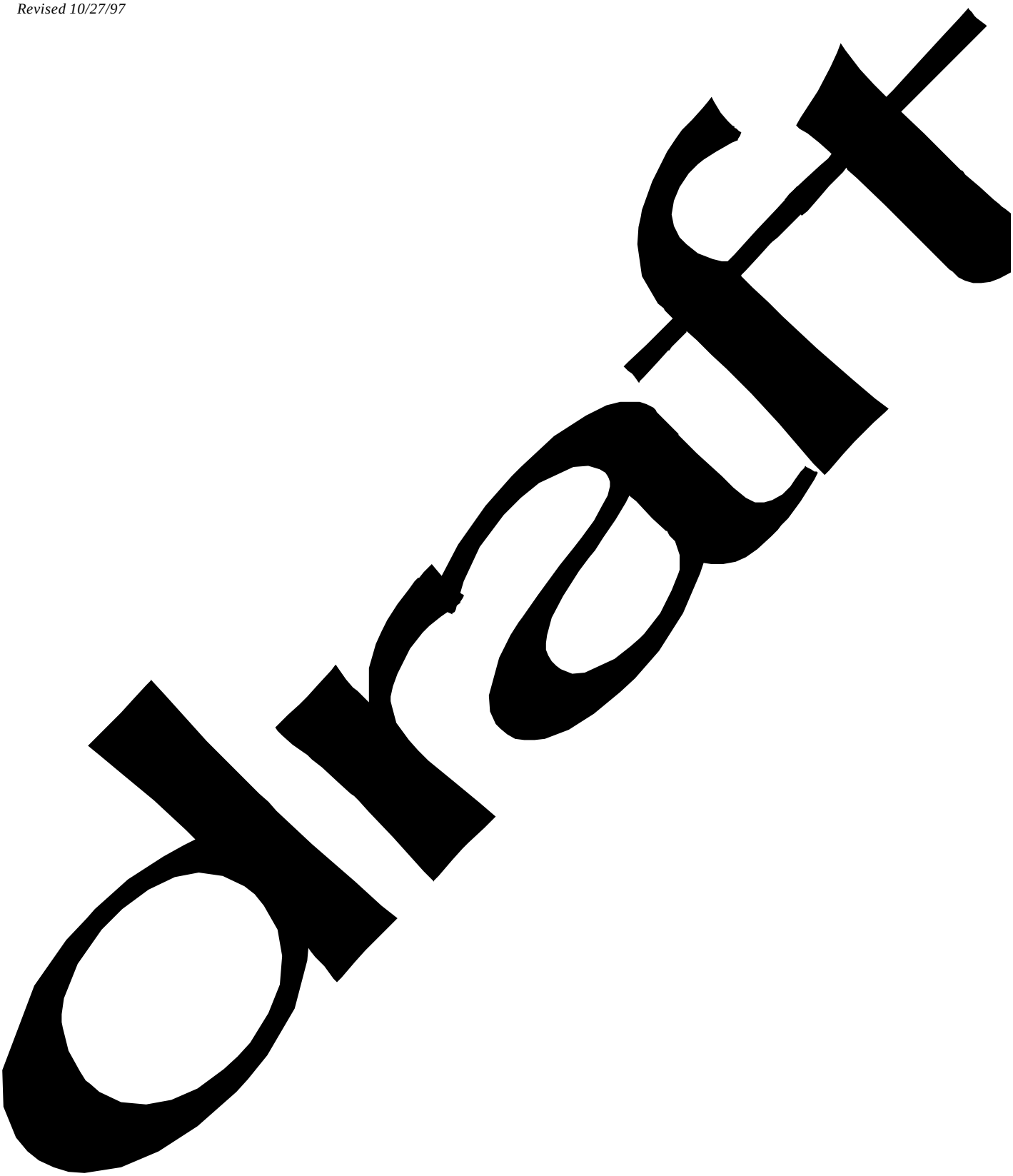
Division for Air Quality



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SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application which was determined to be administratively and technically complete on December 9, 1997, the Kentucky Division for Air Quality hereby authorizes the construction and operation of the equipment described herein conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in the Regulation 401 KAR 50:035 Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

EP01 and the press that uses heat set ink part of EP02 (01W and 02W)

Description:

01W and **02W** are **Baker Perkins G14 Web Printing Presses** using a fountain solution to distinguish between print area and non-print area with an oven and a chiller.
01W has a UV curing coating applicator (with no potential to emit).
01W and 02W have a maximum feed rate of 14,000 ft/hr each but typically be operated at 7,000 to 8,000 ft/hr for quality control reasons.
01W and 02W have 6 application stations each which utilize cylinders having a printable surface 36 inches wide and the capacity to print on both sides of the web.
01W and 02W are each capable of using heat set ink at a maximum design rate of 96 gal/hr.
The ovens on 01W and 02W each use 2-2.93 MM Btu/hr maximum heat input natural gas to dry the web.
01W and 02W have computer controlled automatic blanket wash equipment which uses an expanding diaphragm to clean ink from the press.
01W construction commenced: 1986.
02W construction commenced: 1991.

APPLICABLE REGULATIONS:

Regulation **401 KAR 50:012**, General application effective June 24, 1992, requiring implementation of standards for national primary and secondary ambient air quality, specifies that control procedures that are reasonable, available and practical shall be used.

Regulation **401 KAR** [illegible] process operations applicable to each affected facility associated with a process which commenced after July 2, 1975, limits particulate emissions.

Operating Limitations:

401 KAR 50:0[illegible]

The following limitations reflect the degree of control which is required by Section 1(1) of 401 KAR 50:012.

1. Negative pressure shall be maintained at the dryer exhaust inlet when the press is in operation.
2. An air flow direction measuring device shall be operated according to manufacturer's instructions at the oven exhaust inlets.

Note: This condition is required to demonstrate compliance with Operating Limit #1.

3. VOC control equipment must be operated in accordance with Item 2 of Section E to comply with Emission Limit #3.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Operating Limitations (Continued):

401 KAR 50:012

4. The fountain solution shall be limited to a maximum of 3% alcohol content by volume if the fountain is refrigerated below 60° F or to a maximum of 8% alcohol content by volume if the fountain temperature is at or above 60° F.

5. A thermometer or other temperature detection device with a precision of one degrees or minutes 0.5° F shall be used and attached to a continuous recording device to demonstrate temperature of the fountain solution.

Note: This condition is required to demonstrate compliance with Operating Limit #4.

6. A conductivity meter shall be used at the fountain and the meter shall be referenced to the undoctored water used in the fountain so that isopropyl alcohol concentrations can be measured accurately.

Note: This condition is required to demonstrate compliance with Operating Limit #4.

7. Cleaning solutions shall be limited to a VOC partial pressure of less than 10 mm Hg @ 20° C provided closed containers are used to contain the waste portions (including solvent laden towels) as demonstrated by at least 50% evaporation of the cleaning solution.

Compliance Demonstration Method:

Operating Limit #4

If deemed necessary, the Cabinet shall obtain samples of the fountain solution at the reservoir to verify compliance with this requirement through gas chromatograph analysis (similar to EPA method 415.1) or refractometer comparison to standard solutions.

Conductivity meter readings may be used. This method shall not be used to replace sampling to demonstrate the content of the fountain solution.

401 KAR 59:010

To satisfy the requirements of 40 CFR 70.6, the following limits will apply.

8. Only pipeline natural gas shall be burned in the ovens.

9. Only heatset use with heatset web presses shall be used.

10. Operation and maintenance shall be practiced in accordance with manufacturers specifications.

Nonattainment Area PSD/Synthetic Minor Limits

See Section D for limits on 02W.

Emission Limitations:

401 KAR 59:010

Section 3(1) limits visible emissions to less than 20% opacity.

Section 3(2) limits emissions of particulate matter to a maximum of 2.34 lbs/hr.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Limitations (Continued):

401 KAR 50:012

As part of the requirements imposed by Section 1(1) of 401 KAR 50:012, the following emission limit shall apply.

3. At least 90% of the VOC emissions entering the dryer exhaust must be eliminated from the stack while the press is in operation (see Item 2 of Section B for details of how this is to be accomplished).

Compliance Demonstration Method:

Initial compliance shall be demonstrated through the result of testing requirements. See testing requirements below. Continued compliance shall be demonstrated by monitoring. See monitoring section below.

Nonattainment Area NSR Synthetic Minor Limits

See Section D for limits on 02W.

Testing Requirements:

401 KAR 50:012

As part of the requirements imposed by Section 1(1) of 401 KAR 50:012, the following testing shall be required.

1. VOC emissions shall be tested within 180 days of initial thermal oxidizer operation in accordance with Section G(d) of this permit and once every 5 years following the initial test in order to demonstrate that at least 90% of the VOC emissions are being controlled.

a. EPA Method 1 or 1A, as appropriate, from 40 CFR 60, Appendix A shall be used to select a sampling site and velocity traverses.

b. EPA Method 2, 2A, 2C or 2D, as appropriate, from 40 CFR 60, Appendix A shall be used to determine the velocity and flow rate of the exhaust stream.

c. EPA Method 25 or 25A, as determined by good judgment of anticipated destruction efficiency and the best applicable test method, from 40 CFR 60, Appendix A shall be used to determine the VOC concentration of the exhaust stream **before** and **after** incineration. If exhaust VOC concentrations are 50 ppm or less, EPA Method 25A should be used. Testing the exhaust stream only after incineration may be allowed if the division approves a properly submitted protocol which includes procedures for an accurate material balance of VOCs. An accurate material balance of VOCs would include the masses of VOCs input due to ink use, fountain operation, and cleaning solution used during the test in conjuction with tested substrate retention of VOCs, capture of fountain VOCs, capture of cleaning solution VOCs, after incineration VOC concentration, and exhaust stream volumetric flow rate.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Monitoring Requirements:

401 KAR 50:012

As part of the requirements imposed by Section 1(1) of 401 KAR 50:012, the following monitoring shall be required to demonstrate compliance.

1. The temperature of the combustion chamber for the thermal oxidizer shall be continuously monitored while the press is in operation.
2. Direction of air flow at the oven exhaust inlet shall be continuously monitored while the press is in operation.
3. Fountain solution conductivity shall be monitored once per shift. In addition, conductivity of the fountain shall be monitored during and [illegible] (until the reading stabilizes) any additions to the fountain.
4. Fountain solution temperature shall be continuously monitored.
5. The amount of cleaning solution used shall be monitored daily and the amount of cleaning solution recovered shall be monitored once per month.
6. Cleaning solution vapor pressure and VOC content established through use of credible evidence (ex. MSDS information, testing) shall be monitored. If the manufacturer of the cleaning solution changes the formulation of the cleaning solution, the permittee changes the composition of the cleaning solution through dilution or the permittee chooses to use a cleaning solution from a different manufacturer with a different composition, the changes in physical properties and composition shall be monitored.

401 KAR 59:010

See Operating Limitations #8, #9, and #10 and Specific Recordkeeping Requirements #7, #8, #9, and #10 for requirements which will used to demonstrate compliance and replace monitoring requirements associated with 401 KAR 59:010.

Specific Recordkeeping Requirements:

401 KAR 50:012

As part of the requirements imposed by Section 1(1) of 401 KAR 50:012, the following recordkeeping requirements shall be required.

1. The temperature of the combustion chamber for the thermal oxidizer shall be recorded continuously by a strip chart, computer, or some other continuous recording device.
2. Any air flow measurements at the dryer exhaust inlets when a press is operating which are not into the incinerator shall be recorded.
3. All fountain solution conductivity monitoring shall be recorded.
4. The temperature of the fountain solution shall be recorded continuously by a strip chart, computer, or some other continuous recording device.
5. The cleaning solution vapor pressure, VOC content, amount used, and amount recovered shall be recorded when monitored (see Specific Monitoring Requirements #5 and #6).

Any corrective actions taken to rectify a monitored parameter out of its normal operating range shall also be recorded daily.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Recordkeeping Requirements (Continued):

401 KAR 59:010

To demonstrate compliance with Operating Limit #8,

7. A record of the type of fuel burned in the ovens shall be maintained.

To demonstrate compliance with Operating Limit #9,

8. A record of the type of ink used by the presses shall be maintained.

To demonstrate compliance with Operating Limit #10,

9. A copy of the manufacturer's operating and maintenance spe[illegible] shall be maintained and made available to appropriate division personnel,

10. Any operation or maintenance that is outside of the [illegible]er's minimum recommendation shall be recorded,

and **11.** Dates of maintenance performance shall be recorded.

Nonattainment Area NSR Synthetic Minor Require[illegible]

See Section D for requirements on 02W.

Specific Reporting Requirements:

401 KAR 50:012

As part of the requirements imposed by [illegible]ection 1(1) of 401 KA[illegible]:012, the following reporting requirements shall be requ[illegible]

1. Any exceedance of a permit [illegible]ion, dura[illegible], and corre[illegible]ve actions taken shall be itemized in a report (if there [illegible]o exceeda[illegible] or correct[illegible] actions taken, this shall be reported also), certified by [illegible]esponsible [illegible], an[illegible]ivered or postmarked to the Di[illegible]sion's Florence R[illegible] Office withi[illegible]ollowing the end of each quarter.

2. [illegible]ntain moni[illegible]e converte[illegible]ol concentration with corresponding [illegible]re and ite[illegible] and time in a report, certified by a responsible official, [illegible] or postma[illegible]Division's Florence Regional Office within thirty days foll[illegible]d of each [illegible]

Nonattai[illegible]R Synthet[illegible]nor Requirements

See S[illegible]ion D fo[illegible]ts on 02W.

Specifi[illegible]Control Equipment [illegible] Conditions:

See Item 2 of Section [illegible] fo[illegible]tails.

A[illegible]rnate Operating Scena[illegible]os:

N/A

[illegible]pliance Schedule:

Refer to Section [illegible]

[illegible]nce Certifi[illegible]ion Requirements:

[illegible]tion I for compliance certification required in association with bringing these [illegible] units into compliance with requirements set by 401 KAR 50:012. Refer to Item 7 of Section F for other general certification requirements. And, refer to Item (d) of Section G for construction certification requirements.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

The press that uses sheet fed ink part of EP02, EP03, and EP04 (01SF, 02SF, 03SF, 04SF, 05SF, 06SF, and 07SF)

Description:

01SF, 02SF, 03SF, and **04SF** are **6-color Heidelberg Sheet Fed Printing Presses** using a fountain solution to distinguish between print area and non-print area.
05SF is a **5-color Harris Sheet Fed Printing Press** using a fountain solution to distinguish between print area and non-print area.
06SF and **07SF** are **8-color Heidelberg Sheet Fed UV Setting Presses** using a fountain solution to distinguish between print area and non-print areas and a UV lamp to set the ink.
01SF, 02SF, 03SF, and 04SF each have an aqueous coating station, an ambient air dryer and a starch applicator. Additionally, 05SF has an ambient air dryer and 07SF will be equipped with an aqueous coating station.
These presses are capable of printing at a rate between 15,000 and 18,000 impressions per hour but will typically be operated at 8,000 impressions per hour for quality control reasons.
All of these presses print on only one side and have a maximum paper size of 40" by 40".
01SF, 02SF, 03SF, 04SF, and 05SF each utilize sheet fed ink at or below a maximum design rate of 7.38 gallons per hour.
06SF and 07SF each utilize UV setting ink at or below a maximum design rate of 7.66 gallons per hour.
All these presses are cleaned manually.
All these presses have no emission control equipment for VOC emissions but the presses that apply aqueous coatings have a filtered air system.
01SF: Construction commenced: 1991.
02SF, 03SF, 04SF, 05SF, 06SF: Construction commenced: 1996.
07SF: Construction projected: to commence Jan. 1999.

APPLICABLE REGULATIONS:

Regulation **401 KAR 50:012**, General application effective June 24, 1992, requiring implementation of state and national primary and secondary ambient air quality, specifies that control procedures which are reasonable, available, and practical shall be used.

Regulation **401 KAR 59:010**, New process operations applicable to each affected facility associated with a new process operation commenced after July 2, 1975, limits particulate emissions.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Operating Limitations:

401 KAR 50:012

The following limits represent the degree of control which is requir[illegible] Section [illegible] KAR 50:012.

1. The fountain solution shall be limited to a maximum of 8.5% [illegible]alcohol content[illegible] vo[illegible] if the fountain is refrigerated below 60° F or to a maxim[illegible] of 5% alco[illegible] content [illegible] volume if the fountain temperature is at or above 60° F.
2. A thermometer or other temperature detection device with [illegible] of plus or minus 0.5° F shall be used and attached to a continuous recor[illegible] to demonstrate temperature of the fountain solution.

Note: This condition is required to demonstrate compliance wi[illegible] Op[illegible] #1.

3. A conductivity meter shall be used at the fountain and the meter shall [illegible] to the undoctored water used in the fountain so that isopropyl alcohol conce[illegible] be measured accurately.

Note: This condition is required to demonstrate co[illegible] perating Limit #1.

4. Cleaning solutions shall be limited to a VO[illegible] partial p[illegible] s than 1[illegible] mm Hg @ 20° C provided closed containers are used[illegible] contain u[illegible]sed [illegible]ns (including solvent laden towels) as demonstrated [illegible] at least 50[illegible] recove[illegible]eaning solution.

Compliance Demonstration Metho[illegible]

Operating Limit #1

If deemed necessary, the Cabinet[illegible] l obtain sa[illegible]es of the fo[illegible]tain solution at the reservoir to verify compliance with this r[illegible]uirement th[illegible] gas c[illegible]matograph analysis (similar to EPA [illegible]thod 415.1) or re[illegible]ter compar[illegible]d solutions.

C[illegible] meter read[illegible] may be used (this method shall not be used to replace samp[illegible]onstrate a[illegible]t of the fountain.

401 KAR [illegible]

To satisfy [illegible]irements [illegible] CFR 70.6, the following limit will apply.

5. P[illegible]sses using [illegible]be vented into the pressroom.

[illegible]onattainment Area [illegible]thetic Minor and Less than Significant Limits

See Section D for lim[illegible].

I[illegible]ssion Limitations:

401 KAR 59:010

1. Section 3([illegible]) limits visible emissions to less than 20% opacity.
2. Sectio[illegible]) limits emissions of particulate matter to a maximum of 2.34 lbs/hr.

[illegible]ttainment Area NSR Synthetic Minor and Less than Significant Limits

See Section D for limits.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Testing Requirements:

N/A

Specific Monitoring Requirements:

401 KAR 50:012

As part of the requirements imposed by Section 1(1) of 401 [illegible]AR 50:012 [illegible] followin[illegible] monitoring shall be required.

1. Fountain solution conductivity shall be monitored once [illegible]hift. In addition, conductivity of the fountain solution shall be monitored du[illegible]st after (until the reading stabilizes) any additions to the fountain.
2. Fountain solution temperature shall be continuously monito[illegible]d.
3. The amount of cleaning solution used shall be monitored [illegible]ly and the [illegible] cleaning solution recovered shall be monitored once per month.
4. Cleaning solution vapor pressure and VOC conte[illegible] established [illegible]se of credible evidence (ex. MSDS information or [illegible]ially monito[illegible] If the manufacturer of the cleaning solution change[illegible] formu[illegible] cleaning [illegible]olution, the permittee changes the composition of the c[illegible]ning soluti[illegible] the permittee chooses to use a cleaning solution fr[illegible] a differe[illegible] manuf[illegible]ith a different composition, the changes in physical [illegible]operties a[illegible] compositi[illegible] be monitored.

401 KAR 59:010

See Operating Limitation #5 for [illegible]irement w[illegible] will be u[illegible] to assure compliance and replace monitoring requirement[illegible]ssociated w[illegible]1 KA[illegible]:010.

Specific R[illegible]eeping Re[illegible]

[illegible]012

As p[illegible]quirement[illegible]y Section 1(1) of 401 KAR 50:012, the following recordk[illegible]l be require[illegible]

1. All fou[illegible]ctivity mo[illegible]ll be recorded.
2. The t[illegible] fountain [illegible]on shall be recorded continuously by a strip chart, c[illegible]puter, or [illegible] continuous recording device.
3. The cleaning sol[illegible]ntent, amount used, and amount recovered shall be recorded when monitored ([illegible] Monitoring Requirements #3 and #4).
4. Any corrective act[illegible]ns [illegible]en to rectify a monitored parameter out of its normal operating range shall be rec[illegible]ded daily.

Nonattainment A[illegible]a NSR Synthetic Minor and Less than Significant Requirements

See Section D f[illegible] requirements.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Reporting Requirements:

401 KAR 50:012

As part of the requirements imposed by Section 1(1) of 401 KAR 50:012, the following reporting shall be required.

1. Any exceedance of a permit condition, duration, and corrective actions taken shall be itemized in a report (if there are no exceedances or corrective actions taken this shall be reported also), certified by a responsible official, and delivered or postmarked to the Division's Florence Regional Office within thirty days following the end of each quarter.
2. All fountain monitoring shall be converted to alcohol concentration with corresponding temperature and itemized by date and time in a report, certified by a responsible official, and delivered or postmarked to the Division's Florence Regional Office within thirty days following the end of each quarter.

Nonattainment Area NSR Synthetic Minor and Less Than Significant Requirements

See Section D for requirements

Specific Control Equipment Operating Conditions:

N/A

Alternate Operating Scenarios:

N/A

Compliance Schedule:

N/A

Compliance Certification Requirements:

Refer to Item 7 of Section B for general certification requirements. And, refer to Item (d) of Section B for construction notification requirements.

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to Regulation 401 KAR 50:035, Section 5(4). While these activities are desig[illegible]d as insignificant the permittee must comply with the applicable regulation and some minim[illegible] periodic monitoring may be necessary.

Description	Gen[illegible]ally Applicable Regu[illegible]
1. Internal Combustion Engine less than 50 hp (Tractor)	4[illegible] KAR 59:[illegible]0
2. Film Processing Using Sodium Sulfite, Hydroquinone, and Sodium Hydroxide	4[illegible]:022

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

Nonattainment Area NSR Synthetic Minor and Less than Significant Lim have voluntarily been accepted for several emission units to avoid applicability of 51:052, Review of new sources in or impacting upon nonattainmer s, requ

Emission Limitations:

EP02 (02W and 01SF) nonattainment area NSR synthetic m r limitation

1. VOC emissions from 02W and 01SF shall total 88 tons pe ear or less a monstrate on a monthly basis.

EP03 (02SF, 03SF, 04SF, 05SF and 06SF) nonattainment a s than significant limitation

2. VOC emissions from 02SF, 03SF, 04SF, 05SF, and 06SF sha ns per year or less as demonstrated on a monthly basis.

EP04 (07SF) nonattainment area NSR less than significan limitatio

3. VOC emissions from 07SF shall be limited to no more than 23 t r as demonstrated on a monthly basis.

Compliance Demonstration Method:

The Control Technology Guidance (CTG) e ded Contr of Compound Emissions from Offset Lithographic Printing nd its June 1994 supp used to estimate capture efficiency and substrate retention r offset lith graphic prin g. From this guidance, the following VOC reductions have b found to h e technical erit.

20% of the VOCs in heat set are retain y the subst e
95% of the VOCs in nonhea t inks are r d by th bstrate
50% recovery of clea s tions is req mit condition and as such should not be cou emitted

A Cs used in process shall be assumed to be emitted. The following esti lso been fo technical merit due to the above cited guidance.

10 f the VOC the heat set inks
40% c VOCs em use of cleaning solutions
70% c OCs emitte n the fountain solution

B sing these esti material balance, the following formula may be used to etermine emissions. or superior demonstration methods may be approved by the Division for Air Qual ied for and found to adequately apply.

For presses without OC control equipment:

C emitted (lbs) = **3** gallons of ink x (1 - substrate retention) x VOC content of ink (lbs/gal)]
+ **3** [gallo f cleaning solution used x 0.5 x VOC content of solvent (lbs/gal)]
+ **3** [gallons of isopropyl alcohol used x 6.57 lbs/gal]
ons of nonalcohol fountain additive used x VOC content of the additive (lbs/gal)]
+ **3** [gallons of aqueous coating used x VOC content of the coating (lbs/gal)]

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

Emission Limitations (Continued):

Compliance Demonstration Method (Continued):

For presses with VOC control equipment:

VOC emitted (lbs) = (1 - control efficiency of the equipment) x **3** [ink uncontolled emission (lbs)] + 0.6 x **3** [cleaning solution uncontrolled emission (lbs)] + 0.4 x (1 - control efficiency of the equipment) x **3** [cleaning solution uncontrolled emission (lbs)] + 0.3 x **3** [alcohol and other fountain additives uncontrolled emission (lbs)] + 0.7 x (1 - control efficiency of the equipment) x **3** [alcohol and other fountain additives uncontrolled emission (lbs)]

where ink, cleaning solution, alcohol, and other fountain additive uncontrolled emissions are equal to the respective emissions from the equation for presses without control equipment.

Specific Recordkeeping Requirements:

Nonattainment area NSR synthetic minor and less than significant emissions require the following to be recorded.

EP02 (02W and 01SF)

1. Gallons of heat set ink used at 02W shall be recorded monthly along with the actual or maximum VOC content (mass/volume) of the ink.
2. Gallons of sheet fed ink used at 01SF shall be recorded monthly along with the actual or maximum VOC content (mass/volume) of the ink.
3. Total gallons of isopropyl alcohol used at 02W and 01SF shall be recorded monthly.
4. Gallons of nonalcohol fountain additive used at 02W and 01SF shall be recorded monthly along with VOC content of the additive or additives.
5. Gallons of aqueous coating used at 02W and 01SF shall be recorded monthly along with the VOC content of the coating or coatings.
6. Total gallons of cleaning solution used at 02W and 01SF shall be recorded monthly along with the VOC content of the solution or solutions.

EP03 (02SF, 03SF, 04SF, 05SF and 06SF)

7. Total gallons of sheet fed ink used at 02SF, 03SF, 04SF, and 05SF shall be recorded monthly along with the actual or maximum VOC content (mass/volume) of the ink.
8. Gallons of UV setting ink used at 06SF shall be recorded monthly along with the actual or maximum VOC content (mass/volume) of the ink.
9. Total gallons of isopropyl alcohol used at 02SF, 03SF, 04SF, 05SF, and 06SF shall be recorded monthly.
10. Total gallons of nonalcohol fountain additive used at 02SF, 03SF, 04SF, 05SF, and 06SF shall be recorded monthly along with VOC content of the additive or additives.
11. Gallons of aqueous coating used at 02SF, 03SF, and 04SF shall be recorded monthly along with the VOC content of the coating or coatings.
12. Total gallons of cleaning solution used at 02SF, 03SF, 04SF, 05SF, and 06SF shall be recorded monthly along with the VOC content of the solution or solutions.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

Specific Recordkeeping Requirements (Continued):

EP04 (07SF)

13. Gallons of UV setting ink used at 07SF shall be recorded monthly along with the maximum VOC content (mass/volume) of the ink.

14. Gallons of isopropyl alcohol used at 07SF shall be recorded monthly.

15. Gallons of nonalcohol fountain additive used at 07SF shall be recorded monthly along with the VOC content of the additive or additives.

16. Gallons of aqueous coating used at 07SF shall be recorded monthly along with the VOC content of the coating or coatings.

17. Total gallons of cleaning solution used at 07SF shall be recorded monthly along with the VOC content of the solution or solutions.

Specific Reporting Requirements:

Nonattainment area NSR synthetic minor and less than significant limitations: the following to be reported on a quarterly basis. The reports shall be certified by a responsible official, and delivered or postmarked to the Florence Regional Office within thirty days following the end of the quarter. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

1. All specific recordkeeping requirements listed in Section D shall be reported.

2. The amount of VOC used each month in the quarter at each EP shall be reported.

3. The amount of VOC emissions each month in the quarter at each EP shall be reported.

4. The amount of VOC emissions for the most recent 12 month period shall also be reported for each month in the quarter.

Note: During the first 12 months after issuance of this permit, some or all of the previous monthly data for this will not be available. During this time period, reports shall total available and note the amount of data not available.

General Compliance Requirements Section:

1. VOC emissions measured by the procedures referenced in 401 KAR 50:015, Section 1, shall not exceed the limitations contained herein.

2. Compliance with emissions and processing limitations imposed pursuant to 401 KAR 50:035, Section 7(1) contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

1. Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and [illegible]perate any affected facility including associated air pollution control equipment in [illegible] consistent with good air pollution control practice for minimizing e[illegible]ions. D[illegible] of whether acceptable operating and maintenance procedures are b[illegible] used will be [illegible] information available to the division which may include, but i[illegible]t limited to, [illegible] results, opacity observations, review of operating and maintenan[illegible] procedures, [illegible] inspect[illegible] of the source.

2. **401 KAR 50:012**

   The source has agreed to install a thermal oxidizer on the presse[illegible]eat set ink (this means **01W** and **02W**) as part of the emission limitation required [illegible] of 401 KAR 50:012.

   a. Since the permittee has proposed to control VOC emissions from both p[illegible] 02W with one thermal oxidizer, the thermal oxidizer sha[illegible] least capabl[illegible]ng 5000 scfm (if more presses are connected to t[illegible]zer, the oxid[illegible]all be required to be larger in accordance with the a[illegible] each additi[illegible]l press).
   b. The minimum thermal oxidizer residence t[illegible]e shall be [illegible]cond[illegible]
   c. The thermal oxidizer shall be operated at [illegible] temperatur[illegible]uffic[illegible]e at least 90% of the VOC emissions from the dryer [illegible]haust stack [illegible]as determ[illegible]ng testing) while either press is in operation.
   d. A temperature monitoring devi[illegible] be insta[illegible]d, calibrated [illegible]maintained, and operated according to manufacturer's i[illegible]ctions in t[illegible] combustion [illegible]amber. The temperature monitoring device shall hav[illegible] precision o[illegible]s or min[illegible].5° F.
   e. See Section B **EP01 a[illegible] the [illegible]ress that u[illegible] part of EP02 (01W and 02W)** f[illegible]sting, monito[illegible]dkeeping, [illegible]ng requirements associated with [illegible] of the th[illegible]er.
   f. [illegible] I for the [illegible] Schedule proposed for installation and initial utilization o[illegible] oxidizer.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

1. When continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
   a. Date, place as defined in this permit, and time of sampling or measurements;
   b. Analyses performance dates;
   c. Company or entity that performed analyses;
   d. Analytical techniques or methods used;
   e. Analyses results; and
   f. Operating conditions during time of sampling or measurement.

2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of reports required by the Division for Air Quality, shall be retained by the permittee for a minimum of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality. [401 KAR 50:035, Permits, Section 7(1)(d)2. and 401 KAR 50:035, Permits, Section 7(2)(c)]

3. In accordance with the requirements of Regulation 401 KAR 50:035, Permits, Section 7(2)(c) the permittee shall allow the Cabinet or authorized representative upon the following:
   a. Enter upon the premises where a source is located or emissions related activity is conducted, or where records are kept;
   b. Have access to and copy, at reasonable times, any records required by the permit:
      i. During normal office hours and
      ii. During periods of emergency when prompt access to records is essential to proper assessment by the Cabinet;
   c. Inspect, at reasonable times any facilities, including monitoring and pollution control equipment, practices or operations required by the permit. Reasonable times include, but are not limited to the following:
      i. All hours of operation at the source,
      ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays;
      iii. During an emergency; and
   d. Sample or monitor at reasonable times, substances or parameters to assure compliance with the permit or applicable requirements. Reasonable times shall include, but are not limited to the following:
      i. During all hours of operation at the source,
      ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays; and
      iii. During an emergency.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry may constitute grounds for permit revocation and assessment of civil penalties.

5. Reports of any monitoring required by this permit, other than continuous emission and opacity monitors, shall be reported to the Division's Florence Regional Office no later than the six month anniversary date of this permit and every six months thereafter during the life of this permit, unless otherwise stated in this permit. Data from the continuous emission and opacity monitors shall be reported to the Technical Services Branch in accordance with the requirements of Regulation 401 KAR 59:005, General Provisions, Section 2(3). All reports shall be certified by a responsible official pursuant to Section 6(2) of Regulation 401 KAR 50:035, Permits. All deviations from permit requirements shall be clearly identified in the reports.

6. a. In accordance with the provisions of Regulation 401 KAR 50:055, Section 2, the owner or operator shall notify the Division for Air Quality's Florence Regional Office concerning startups, shutdowns, or malfunctions as follows:
   1. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
   2. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) with written notice upon request.

   b. In accordance with the provisions of Regulation 401 KAR 50:035, Section 7(1)(e)2, the owner or operator shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by general condition 6.a above) to the Division for Air Quality's Florence Regional Office.

7. Pursuant to Regulation 401 KAR 50:035, Permits, Section 7(2)(b), the permittee shall certify compliance with terms and conditions contained in this permit, annually on the permit issuance anniversary date, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Division for Air Quality's Florence Regional Office and the U.S. EPA in accordance with the following requirements:
   a. Identification of each term or condition of the permit that is the basis of the certification;
   b. The compliance status regarding each term or condition of the permit;
   c. Whether compliance was continuous or intermittent; and
   d. The method used for determining the compliance status for the source, currently and over the reporting period, pursuant to 401 KAR 50:035, Section 7(1)(c),(d), and (e).

   The certification shall be postmarked by the thirtieth (30) day following the applicable permit issuance anniversary date.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

Annual compliance certifications should be mailed to the following addresses:

Division for Air Quality
Florence Regional Office
7960 Kentucky Drive, Suite #8
Florence, KY 41042

U.S. EPA Regio
Air Enforcem Branch
Atlanta Fed Center
61 Forsyth
Atlanta, G 303-896

8. In accordance with Regulation 401 KAR 50:035, Section 23, t shall provide the division with all information necessary to determine its subject within thirty (30) days of the date the KEIS emission report is mailed to the permit

9. Pursuant to Section VII.3 of the policy manual of the Divisio for Air Q ferenced by Regulation 401 KAR 50:016, Section 1(1), results of performance test(the permit shall be submitted to the Division by the source esentative w five days after the completion of the fieldwork.

SECTION G - GENERAL CONDITIONS

(a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. A noncompliance shall be (a) violation(s) of state regulation 401 KAR 50:035, Permits, Section 7(3)(d) and a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) and for enforcement action including but not limited to the termination, revocation and re or revision of this permit.

2. The filing of a request by the permittee for any permit revisi revocation, reissuance, or termination, or of a notification of a planned change or anticip noncompliance, shall not stay any permit condition.

3. This permit may be revised, revoked, reopened and reissued, o cause. The permit will be reopened for cause and revised accordingly und the follo stances:
   a. If additional applicable requirements become applicable to the source remaining permit term is three (3) years or longer. In this case, the ening shall b no later than eighteen (18) months after promulg plicable requ ent. A reopening shall not be required if compliance with le requirement is not required until after the date on which the p mit is due t this permit or any of its terms and conditions have been ex ded pursu to KAR 50:035, Section 12(2)(c);
   b. The Cabinet or the U. S. EPA det mines that the permit must e revised or revoked to assure compliance with the app e require nts.;
   c. The Cabinet or the U. S. EPA mines that permit cont ns a material mistake or that inaccurate statements were m in establis the emiss s standards or other terms or conditions of the permi

   Pr to reope a permit sh ollow the same procedures as apply to in uance and only those parts of the permit for which cause to reopen exists shall be editiously as practicable. Reopenings shall not be initiated ice of inten provided to the source by the Division, at least thirty (30) d nce of the permit is to be reopened, except that the Division may pr period in case of an emergency.

4. The permittee shall Division, in writing, information that the Division may request to determine w se exists for modifying, revoking and reissuing, or terminating the permit, or to deter mpliance with the permit. [401 KAR 50:035, Permits, Section 7(2)(b)3e and 401 K R 50:035, Permits, Section 7(3)(j)]

   The permittee, u becoming aware that any relevant facts were omitted or incorrect information wa mitted in the permit application, shall promptly submit such supplementary ts or co d information to the permitting authority.

SECTION G - GENERAL CONDITIONS (CONTINUED)

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit. [401 KAR 50:035, Permits, Section 7(3)(k)]

7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance. [401 KAR 50:035, Permits, Section 7(3)(e)]

8. Except as identified as state-origin requirements in this permit, all terms and conditions contained herein shall be enforceable by the United States Environmental Protection Agency and citizens of the United States.

9. This permit shall be subject to suspension if the permittee fails to pay all emission fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section [illegible] KAR 50:035, Permits, Section 7(3)(h)]

10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 50:035, Permits, Section 8(3)(b)]

11. This permit shall not convey property rights or exclusive privileges. [401 KAR 50:035, Permits, Section 7 (3)(g)]

12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Natural Resources and Environmental Protection or any other federal, state, or local agency.

13. Nothing in this permit shall affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry. [401 KAR 50:035, Permits, Section 7(2)([illegible])]

14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders. [401 KAR 50:035, Permits, Section 8([illegible])]

15. Permit Shield: Except as provided in State Regulation 401 KAR 50:035, Permits, compliance by the affected facilities listed herein with the conditions of this permit shall be deemed to be compliance with all applicable requirements identified in this permit as of the date of issuance of this permit.

All previously issued construction and operating permits are hereby null and void.

SECTION G - GENERAL CONDITIONS (CONTINUED)

(b) Permit Expiration and Reapplication Requirements

This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration of this permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date until the renewal permit is issued or denied by the Division. [401 KAR 50:035, Permit, Section 1]

(c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of Regulation 401 KAR 50:035, Section 15.

2. This permit is not transferable by the permittee. Future owners and operators must obtain a new permit from the Division for Air Quality. However, it may be processed as an administrative amendment if no other change is made to this permit and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the permitting authority thirty (30) days in advance of the transfer.

(d) Construction, Start-Up, and Initial Compliance Demonstration Requirements

This applies to 07SF and installation of the thermal oxidizer.

1. Construction of process and/or air pollution control equipment authorized by this permit shall be conducted and completed in compliance with all conditions of this permit.

2. Within thirty (30) days following the commencement of construction, and within fifteen (15) days following the actual and attainment of maximum production rate specified in the permit application, but not fifteen (15) days following the issuance date of this permit, whichever is later, the permittee shall furnish the Division for Air Quality's Florence Regional Office in writing and the Division's Frankfort Central Office, notification of the following:
   a. The date when construction commenced.
   b. The date of start-up of affected facilities listed in this permit.
   c. The date when the maximum production rate specified in the permit application was achieved.

SECTION G - GENERAL CONDITIONS (CONTINUED)

3. Pursuant to State Regulation 401 KAR 50:035, Permits, Section 13(1), unless construction is commenced on or before 18 months after the date of issue of this permit, or if construction is commenced and then stopped for any consecutive period of 18 months or more, or if construction is not completed within eighteen (18) months of the scheduled completion date, then the construction and operating authority granted by this permit to those affected facilities for which construction was not completed shall immediately become invalid. Extensions to the time periods specified herein may be granted by the Division upon a satisfactory request showing that an extension is justified.

4. Operation of the affected facilities for which construction is authorized by this permit shall not commence until compliance with the applicable standards specified herein has been demonstrated pursuant to 401 KAR 50:055, except as provided in Section B of this permit.

5. This permit shall allow time for the initial start-up, operation, and compliance demonstration of the affected facilities listed herein. However, within sixty (60) days after achieving the maximum production rate at which the affected facilities will be operated but not later than 180 days after initial start-up of such facilities, the permittee shall conduct a performance demonstration (see Testing Requirements in Section B) on the affected facilities in accordance with Regulation 401 KAR 50:055, General Compliance requirements. **The performance tests must also be conducted in accordance with General Condition (6) of this permit and the permittee must furnish to the Division for Air Quality's Frankfort Central Office a written report of the results of the performance test.**

6. Pursuant to Section VII 2.(1) of the policy manual of the Division for Air Quality as referenced by Regulation 401 KAR 50:045, Section 1.(1), one month prior to the date of the required performance test, the committee shall obtain and return a Compliance Test Protocol (Emission 6027) to the Frankfort Central Office. Pursuant to 401 KAR 50:045, Section 2, the Division shall be notified of the actual test date at least ten (10) days prior to the test.

(e) Acid Rain Requirements

1. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

SECTION G - GENERAL CONDITIONS (CONTINUED)

(f) Emergency Provisions

1. An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
   a. An emergency occurred and the permittee can identify the cause(s) of the emergency;
   b. The permitted facility was at the time being properly operated;
   c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and,
   d. The permittee notified the Division as promptly as possible but submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency. The notice must meet the requirements of 401 KAR 50:035, Permits, Section 7(1)(e)2, and include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken.This requirement does not relieve the source of any other local, state or federal notification requirements.

2. Emergency conditions listed in General Condition (f) are in addition to any emergency or upset provision(s) contained in an applicable requirement.

3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 50:035, Permits, Section 9(3)]

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall:
   a. Submit a Risk Management Plan to U.S.EPA Region IV with a copy to this Division and comply with the Risk Management Program by June 21, 1999 or a later date specified by U.S.EPA.
   b. Submit additional relevant information if requested by the Division or the U.S. EPA.

SECTION G - GENERAL CONDITIONS (CONTINUED)

(h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
   a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
   b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
   c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
   d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166.
   e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
   f. Owners/operators of appliances normally containing fifty or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

SECTION H - ALTERNATIVE OPERATING SCENARIOS

N/A

SECTION I - COMPLIANCE SCHEDULE

This section contains compliance schedule requirements as required by Kentucky Regulation 50:035, Permits, Section 7(2)(a). Progress reports on this schedule must be submitted (using the most current version of Form DEP7007B) at least semiannually, or at more frequent intervals if required by specific conditions outlined below. Reports shall include the following items: (a) Dates for achieving each milestone, and the actual date that compliance is achieved; and (b) An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted to ensure that compliance with future items will be brought back on schedule.

1. **401 KAR 50:012** has required reasonable, available, and practical controls (effective June 24, 1992) but the permittee has not installed the necessary controls. During Title V review of the source, the following **determination** has been made.

   1. All reasonable, available, and practical controls have not been implemented resulting in noncompliance with 401 KAR 50:012.

   The source has agreed that the following **controls** are required to correct the noncompliance.

   1. A thermal oxidizer shall be used to eliminate at least 90% of the VOC emissions from 01W and 02W.

   2. The fountain solution used by 01W and 02W shall have a maximum of 5% alcohol content by volume if the fountain is refrigerated below 60° F, a maximum of 1.6% alcohol content by volume if the fountain temperature is at [illegible]

   3. The fountain solution used by 01SF, 02SF, 03SF, 04SF, 05SF, [illegible] shall be limited to a maximum of 8.5% alcohol content by volume if the fountain is refrigerated below 60° F or to a maximum of 5% alcohol content by volume if the fountain temperature is at or above 60° F.

   The source has agreed to the following **corrective action**.

   To comply with control #1, the following shall be done.

   The permittee shall submit a proposal to the division for Air Quality specifying the make, model, monitoring equipment, and operating scenario for the thermal oxidizer to be used. This shall be done by March 1, 1999.

   The permittee shall provide the division a written assurance that funds have been secured for purchase and installation of the proposed thermal oxidizer by June 1, 1999.

   3. The permittee shall sign a purchasing agreement for installation of the thermal oxidizer by August 1, 1999 and shall submit to the division evidence of such action within one week of signing.

   4. The permittee shall begin installation of the thermal oxidizer by October 1, 1999.

   5. The permittee shall have the thermal oxidizer and all required monitoring equipment completely installed and operational by January 1, 2000.

   6. The permittee shall demonstrate compliance with the 90% VOC reduction requirement through stack testing on or before July 1, 2000 as required by permit conditions (d)5 and (d)6 of Section G.

   To demonstrate compliance with control #2 and #3, the following shall be required.

   The permittee shall install a strip chart, computer, or some other continuous recording device at all fountains used by 01W, 02W, 01SF, 02SF, 03SF, 04SF, 05SF, and 06SF to chronicle the temperature of the fountain solution. This shall be done by January 1, 1999.

SECTION I - COMPLIANCE SCHEDULE (CONTINUED)

2. Compliance with the terms and conditions of this Section shall be certified annually on the permit anniversary date, to the Division for Air Quality and to the U. S. EPA when compliance has been achieved. The compliance certification shall include the following:
   a. The identification of the permit term or condition in this Section that is the basis of the certification;
   b. The compliance status;
   c. Whether compliance is continuous or intermittent; and,
   d. The method used for determining the compliance status, currently and over the reporting period pursuant to Regulation 50:035, Section 7(1)(c),(d) and (e).